

MALVERN TCE SUPERFUND SITE
ADMINISTRATIVE RECORD FILE *
FOR THE DE MINIMIS SETTLEMENT
INDEX OF DOCUMENTS

I) GUIDANCE DOCUMENTS

- A) “Guidance on Premium Payments in CERCLA Settlements,” OSWER Dir. No. 9835.6 (November 17, 1988).

- B) “Methodologies for Implementation of CERCLA Section 122(g)(1)(A) De Minimis Waste Contributor Settlements,” OSWER Dir. No. 9834.7-1B (December 20, 1989).

- C) “Guidance on Preparing Waste-In Lists in Volumetric Rankings for Release to Potentially Responsible Parties under CERCLA,” OSWER Dir. No. 9835.16 (February 20, 1991).

- D) “Methodology for Early *De Minimis* Waste Contributor Settlements under CERCLA Section 122(g)(1)(A),” OSWER Dir. No. 9834.7-1C (June 2, 1992).

- E) “Streamlined Approach for Settlements with *De Minimis* Waste Contributors under CERCLA Section 122(g)(1)(A),” OSWER Directive 9834.71D (July 30, 1993).

- F) “Standardizing the *De Minimis* Premium,” Bruce Diamond, Director, Office of Site Remediation Enforcement (July 7, 1995).

* Administrative Record File available 1/19/00 .

II) POTENTIALLY RESPONSIBLE PARTIES

A) Letter regarding General Notice of Potential Liability in relation to the Malvern TCE Superfund Site, dated November 16, 1996. P. 000001-000058.

1) Attachments

a) Site Fact Sheet.

b) Draft Volumetric Ranking, dated 11/14/96.

2) Comprehensive Mailing List of Potentially Responsible Parties who were sent the November 16, 1996, General Notice of Potential Liability Letter.

B) Letter conveying the *De Minimis* Settlement Offer, dated December 16, 1998. P. 000059-000201.

1) Attachments

a) Final Administrative Order on Consent for *De Minimis* Parties.

b) Volumetric Ranking Summaries Overview and Methodology.

c) Volumetric Ranking Summaries Challenges and EPA's Response.

d) Comprehensive Mailing List (All Site PRPs).

2) List of *De Minimis* parties who were sent the December 16, 1998, *De Minimis* settlement offer.

III) VOLUMETRIC RANKING AND METHODOLOGY

- A) Malvern TCE Volumetric Ranking Summaries/Overview and Methodology. P. 000202-000210.
- B) Malvern TCE Superfund Site Generator Volumetric Ranking Summary by Descending Order, dated 11/30/98. P. 000211-000227.
- C) Malvern TCE Superfund Site Generator Volumetric Ranking Summary by Alphabetical Listing, dated 11/30/98. P. 000228-000243.
- D) Malvern TCE Superfund Site Broker/Transporter Volumetric Ranking Summary, dated 11/30/98. P. 000244-000275.
- E) Comprehensive Transaction Report Summary for each potentially responsible party in relation to the Malvern TCE Superfund Site, dated 3/4/99. P. 000276- 000746 .
- F) Memorandum from William C. Early, US EPA, Acting Regional Counsel and Abraham Ferdas, US EPA, Director, Hazardous Site Cleanup Division, to W. Michael McCabe, US EPA, Region III, Regional Administrator, Re: Explanation of Proposed De Minimis Settlement for the Malvern TCE Superfund Site, dated 5/21/99. P. 000747-000754.

IV) CHALLENGES BY POTENTIALLY RESPONSIBLE PARTIES IN RELATION TO THE MALVERN TCE SUPERFUND SITE.

A) Challenges to the Volumetric Ranking Summaries and/or Methodology.

- 1) Letter to Gary W. Morton, US EPA , Civil Investigator, from Andrew P. Foster, Esq., Counsel for A&L Handles, dated 10/6/97 with attachments. P. 000755-000759.
- 2) Letter to Gary W. Morton, US EPA, Civil Investigator, from Chuck Hungerford, Esq., Counsel for A.S. Koch dated 2/12/98 with attachments. P. 000760-000774.
- 3) Letter to Gary W. Morton, US EPA, Civil Investigator, from Joseph M. Macchione and Harry R. Weiss Esq., Counsel for Action Manufacturing, Inc., dated 11/13/97 with attachments. P. 000775-000784.
- 4) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Patrick S. Till, Environmental/Safety Engineer for Tracor Aerospace Electronic Systems, Inc., dated 8/22/97. P. 000785-000785.
- 5) Letter to Gary Morton, US EPA, Civil Investigator, from Madeline R. Berg, Esq., Counsel for Ametek, Inc. and Hunter Spring, dated 10/10/97 with attachments. P. 000786-000809.
- 6) Letter to Gary Morton, US EPA, Civil Investigator, from Madelaine R. Bert, Esq. Counsel for Ametek, Inc., dated 12/18/96 with attachments. P. 000810-000813.
- 7) Letter to Gary W. Morton, Civil Investigator, from Bernard A. Labuskes, Jr., Counsel for AMP Incorporated dated 9/22/97 with attachments. P. 000814-000822.

- 8) Letter to Gary W. Morton, US EPA, Civil Investigator, from Mark A. Stevens, Esq., Counsel for Armstrong World Industries, dated 10/6/97 with attachments. P. 000823-000828.
- 9) Letter to Gary W. Morton, US EPA, Civil Investigator, from Claire M. Diemer, Esq., Counsel for Beckett Corporation, dated 10/6/97 with attachments. P. 000829-000882.
- 10) Letter Benjamin Fields, Esquire, US EPA, from Clare M. Diemer, Esq., Counsel for Beckett Corporation, dated 12/20/96 with attachments. P. 000883-000885.
- 11) Letter to Gary W. Morton, Civil Investigator, from Clare M. Diemer, Esq., Counsel for Beckett Corporation, dated 7/31/98. P. 000886- 000886 .
- 12) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Bruce Alan Herald, Esq., Counsel for Beemer Precision Co., Inc., dated 11/27/96 with attachments. P. 000887-000889.
- 13) Letter to Gary W. Morton, US EPA, Civil Investigator, from James R. Greene, Esq., Counsel Beemer Precision, Inc., dated 10/3/97 with attachments. P. 000890-000905.
- 14) Letter to Gary W. Morton, US EPA, Civil Investigator, from Patrick O. Cavanaugh, Esq., Counsel for Biddle Instruments, dated 11/6/97. P. 000906-000908.
- 15) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Marc Scott Davies, for Boekel Industries, dated 11/26/96. P. 000909-000909.
- 16) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Douglas B. Clark, Esq., Counsel for Brandt, Inc., dated 11/27/96. P. 000910-000911.
- 17) Letter to Greg Hamm, US EPA, Remediation Manager, from Francis G.X. Pileggi, Esq., Counsel for Brumbaugh Industries, Inc., dated 5/22/97 with

attachments. P. 000912-000916.

- 18) Letter to Greg Hamm, US EPA, Remediation Manager, from Francis G.X. Pileggi, Esq., Counsel for Brumbaugh Industries, Inc., dated 7/2/97. P. 000917-000917.
- 19) Letter to Gary W. Morton, US EPA, Civil Investigator, from Jennifer Berke, Counsel for The Budd Company, dated 10/06/97 with attachments. P. 000918-000922.
- 20) Letter to Gary W. Morton, US EPA, Civil Investigator from Steven D. Meyers, Esq., Counsel for Bunnell Plastics, Inc., dated 10/5/97 with attachments. P. 000923-000931.
- 21) Letter to Gary W. Morton, US EPA, Civil Investigator from Aria A. Klees, Senior Counsel, Environmental Health and Safety for Unisys Corporation, dated 10/6/97 with attachments. P. 000932-001051.
- 22) Letter to Gary W. Morton, US EPA, Civil Investigator from Emily J. Lawrence, Esq., Counsel for Cabot Wrought Products, dated 9/23/97 with attachments. P. 001052-001076.
- 23) Letter Gary Morton, US EPA, Civil Investigator from Emily J. Lawrence, Esq., Counsel for NGK Metals, dated 1/17/97 with attachments. P. 001077-001083.
- 24) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Richard J. Petsche, for Cantol Specialty Chemicals, dated 8/12/97. P. 001084-001108.
- 25) Letter to Gary W. Morton, US EPA, Civil Investigator, from Frank J. Kearney, Jr., for Chobert Manufacturing Corp., dated 10/6/97 with attachments. P. 001109-001112.
- 26) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Arthur Freilich, for Chrono-Log Corporation, dated 11/18/96. P. 001113-001114.

- 27) Letter to Gary W. Morton, US EPA, Civil Investigator, from Christopher J. Pass, for Container Research Corporation, dated 10/2/97. P. 001115-001116.
- 28) Letter to Gary W. Morton, US EPA, Civil Investigator, from Nancy N. Young, Esq., Counsel for Cyprus Foote Mineral Company, dated 10/2/97 with attachments. P. 001117-001144.
- 29) Letter to Gary W. Morton, US EPA, Civil Investigator, from Andrew P. Foster, Counsel for Data Media, Inc., dated 10/06/97 with attachments. P. 001145-001147.
- 30) Letter to Gary W. Morton, US EPA, Civil Investigator, from Kristen S. Caldwell, Legal Assistant, for Donn Corporation., USG Interiors, Floor Systems, Inc. and Davey Products, dated 10/20/97 with attachments. P. 001148-001166.
- 31) Letter to Gary W. Morton, US EPA, Civil Investigator, from Craig Benfield, for Delbar Products, Inc., dated 9/29/97 with attachments. P.
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- 32) Letter to Gary W. Morton, US EPA, Civil Investigator, from Judy Malmquist, for Defense Reutilization and Marketing Service, dated 9/17/97. P. 001180-001180.
- 33) Letter to Greg Hamm, US EPA, Remediation Manager, from Craig Benfield, for Delbar Products, Inc., dated 5/16/97 with attachment. P.
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- 34) Letter to Gary W. Morton, US EPA, Civil Investigator, from Steven D.

- Meyers, Esq., Counsel for Dixon Industries, Inc., dated 10/5/97 with attachments. P. 001183-001186.
- 35) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from David A. Garrison, Esq., Counsel for Eldredge, Inc., dated 6/3/98. P. 001187-001191.
- 36) Letter to Greg Hamm, US EPA, Remediation Manager, from Robert M. Strickler, Esq., Counsel for Electro-Platers of York, Inc., dated 5/16/97 with attachments. P. 001192-001194.
- 37) Letter to Gary W. Morton, US EPA, Civil Investigator, from Robert M. Strickler, Esq., Counsel for Electro-Platers of York, Inc., dated 9/22/97 with attachments. P. 001195-001203.
- 38) Letter to Gary W. Morton, US EPA, Civil Investigator, from Richmond L. Williams, Esq., Counsel for Electronic Display Systems Inc., dated 10/3/97 with attachments. P. 001204-001229.
- 39) Letter to Gary W. Morton, US EPA, Civil Investigator, from Mary E. Schulz, for Hercules Aerospace Display Systems, dated 10/6/97. P. 001230-001273.
- 40) Letter to Gary W. Morton, US EPA, Civil Investigator, from Robert M. Strickler, Esq., Counsel for Emeco Industries, Inc., dated 9/22/97. P. 001274-001280.
- 41) Letter to Gary W. Morton, US EPA, Civil Investigator, from Robert M. Strickler, Esq., Counsel for Emeco Industries, Inc., dated 2/3/97. P. 001281-001281.
- 42) Letter to Gary W. Morton, US EPA, Civil Investigator, from Kim Hollaender, Esq., Counsel for Floor Systems, Inc., dated 2/4/98 with attachments. P. 001282-001304.

- 43) Letter to Gary W. Morton, US EPA, Civil Investigator, from Michael G. Karlis, Esq., Counsel for Formosa Plastics Corporation, U.S.A. dated 5/30/97. P. 001305-001307.
- 44) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Anthony J. Reitano, Esq., Counsel for Gateway Terminal Services Corp., dated 12/19/96. P.001308-001309.
- 45) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Melissa A. Manuel, Esq., Counsel for Hamilton Precision Metals, dated 6/4/97 with attachments. P. 001310-001366.
- 46) Letter to Gary Morton, US EPA, Civil Investigator, from Stephen J. Castellan, for Graphic Packaging Corporation, dated 12/20/96 with attachment. P. 001367-001368.
- 47) Letter to Gary Morton, US EPA, Civil Investigator, from Craig Schnee, for Hamilton Technology, Inc., dated 9/22/97 with attachments. P. 001369-001376.
- 48) Letter to Gary Morton, US EPA, Civil Investigator, from George J. Ozorowski, Esq., Counsel for J & J Spill Services, Inc., dated 7/7/98. P. 00137-7-001377.
- 49) Letter to Gary Morton, US EPA, Civil Investigator, from David C. Toomey, Esq., Counsel for Herman Goldner Co., Inc., dated 10/1/97. P. 001378-001379.
- 50) Letter to Linda Dietz, US EPA, Remedial Project Manager, from John W. Rex, for J.W. Rex Company, dated 5/15/98. P. 001380-001380.
- 51) Letter to Gary Morton, US EPA, Civil Investigator, from Andrew P. Foster, Esq., Counsel for James Spring & Wire Co., dated 10/6/97 with attachments. P. 001381-001408.

- 52) Letter to Gary Morton, US EPA, Civil Investigator, from Frank J. Opet, for Johnson Matthey, dated 9/16/97 with attachments. P. 001409-001417.
- 53) Letter to Gary Morton, US EPA, Civil Investigator, from Susan P. LeGros, Esq., Counsel for Kim Manufacturing, dated 9/25/97 with attachments. P. 001418-001440.
- 54) Letter to Gary Morton, US EPA, Civil Investigator, from Andrew P. Foster, Esq., Counsel for Kulicke & Soffa, dated 10/6/97 with attachments. P. 001441-001451.
- 55) Letter to Gary Morton, US EPA, Civil Investigator, from James D. Brady, for McGee Industries, dated 12/17/96 with attachments. P. 001452-001453.
- 56) Letter to Gary Morton, US EPA, Civil Investigator, from Andrew P. Foster, Esq., Counsel for Moore Products, dated 10/6/97 with attachments. P. 001454-001471.
- 57) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Stephen V. Moser, Associate General Counsel for Mead Corporation, dated 11/27/96. P. 001472-001473.
- 58) Letter to Gary W. Morton, US EPA, Civil Investigator, from David Halpern, for Neutronics, Inc., dated 10/13/97 with attachments. P. 001474-001483.
- 59) Letter to Gregg Hamm, US EPA, Remediation Manager, from William N. Fay, for North Industrial Chemicals, Inc., dated 5/29/97. P. 001484-001485.
- 60) Letter to Gary W. Morton, US EPA, Civil Investigator, from Arundhati Khanwalkar, Esq., Counsel for PP & L, Inc. (f/k/a Pennsylvania Power & Light Company), dated 10/3/97 with attachments. P. 001486-001490.

- 61) Letter to Gary Morton, US EPA, Civil Investigator, from Jean H. McCreary, Esq., Counsel for Vishay Resistive Systems, dated 10/6/97. P. 001491-001517.
- 62) Letter to Gary W. Morton, US EPA, Civil Investigator, from Steven J. Lemon, Esq., Counsel for Plymouth Tube Company, dated 10/3/97 with attachments. P. 001518-001525.
- 63) Letter to Gary Morton, US EPA, Civil Investigator, from Stephen B. Harris, Esq., Counsel for Polysciences, Inc., dated 10/8/97 with attachments. P. 001526-001535.
- 64) Letter to Gregg Hamm, US EPA, Remediation Manager, from Stephen B. Harris, Esq., Counsel for Polysciences, Inc., 6/25/97 with attachments. P. 001536-001544.
- 65) Letter to Gary W. Morton, US EPA, Civil Investigator, from Jay H. Karsch, Esq., Counsel for Porter Instrument Company, Inc., dated 10/2/97 with attachments. P. 001545-001547.
- 66) Letter to Gary W. Morton, US EPA, Civil Investigator, from Harry J.J. Bellwoar III, Esq., Counsel for Princo Instruments, Inc., dated 9/8/97. P. 001548-001548.
- 67) Letter to Gary Morton, US EPA, Civil Investigator, from Harry J. J. Bellwoar, III, Esq., Counsel for Princo Instruments, Inc., dated 12/16/96. P. 001549-001550.
- 68) Letter to Gary Morton, US EPA, Civil Investigator, from Andrew P. Foster, Esq., Counsel for Reilly Plating, dated 10/6/97 with attachments. P. 001551-001565.
- 69) Letter to Gary Morton, US EPA, Civil Investigator, from Steven Picco, Esq., Counsel for SGL Electronics, dated 9/8/97 with attachment. P. 001566-001568.

- 70) Letter to Gary W. Morton, US EPA, Civil Investigator, from Sharon Oras Morgan, Esq., Counsel for Simon Wrecking Co., Inc., dated 10/24/97 with attachments. P. 001569-001575.

- 71) Letter to Gary W. Morton, US EPA, Civil Investigator, from C. William McGlocklin, for SKF USA, Inc., dated 10/2/97 with attachments. P. 001576-001596.

- 72) Letter to Benjamin Fields, US EPA, Assistant Regional Counsel, from Daniel F. Schranghamer, Esq., Counsel for SPD Technologies, dated 3/14/97 with attachments. P. 001597-001600.

- 73) Letter to Gary W. Morton, US EPA, Civil Investigator, from Edwin L. Meyer, Jr., Esq., Counsel for Specialty Castings, Inc., dated 10/3/97. P. 001601-001602.

- 74) Letter to Gary W. Morton, US EPA, Civil Investigator, from Stephen M. Fleischman, for Sterling/Fleischman, Inc., dated 9/12/97. P. 001603-001603.

- 75) Letter to Linda Dietz, US EPA, Remedial Project Manager, from William N. Sterrett, Jr., for Superior Tube Company, dated 2/10/97 with attachments. P. 001604-001635.

- 76) Letter to Linda Dietz, US EPA, Remedial Project Manager, from William N. Sterrett, Jr., for Superior Tube Company, dated 9/30/97 with attachments. P. 001636-001646.

- 77) Letter to Gary W. Morton, US EPA, Civil Investigator, from Jill M. Palmer, for Sweda International, dated 10/3/97 with attachments. P. 001647-001654.

- 78) Letter to Gary W. Morton, US EPA, Civil Investigator, from Chuck Hungerford, Esq., Counsel for Syntex (U.S.A.) Inc., dated 10/3/97. P. 001655-001655.

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- 79) Letter to Gary W. Morton, US EPA, Civil Investigator, from Mario Rafalin, for Xensor Corporation., (f/k/a Transducer Systems, Inc.), dated 1/13/97 with attachments. P. 001668-001671.
- 80) Letter to Gary Morton, US EPA, Civil Investigator, from Sarah D. Plasha, for VIZ Manufacturing Company, dated 8/14/98. P. 001672-001672.
- 81) Letter to Joan Johnson, US EPA, Assistant Regional Counsel and Gary Morton, US EPA, Civil Investigator, from Samuel I. Gutter, Esq., Counsel for Lucent Technologies, Inc., dated 9/29/97. P. 001673-001676.
- 82) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Thomas A. Vendenberg, In-house Counsel for Lockheed Martin Corporation, dated 8/18/98 with attachments. P. 001677-001773.
- 83) Letter to Gary Morton, US EPA, Civil Investigator, from Patricia A. Shaw, Esq., Counsel for Aluminum Company of America, dated 10/2/97 with attachments. P. 001774-001819.
- B) Malvern TCE Superfund Site Volumetric Ranking Challenges and EPA's Response. P. 001820-001824.
- C) Challenges as to misidentification, successorship and liability.
 - 1) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Marietta H. Barbour, Previous Counsel for Autopak, dated 6/27/97. P. 001825-001825.
 - 2) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Joseph A. Harmer, A&J Screw Machine Products Company, dated 5/6/98. P. 001826-001826.

- 3) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Jay Rosenbluth, for A.S. Koch Corp., dated 8/5/97. P. 001827-001827.
- 4) Letter to Linda Dietz, US EPA, Remedial Project Manager, from M.Deer Allgood, for ADEC, dated 9/5/97. P. 001828-001828.
- 5) Letter to Gary Morton, US EPA, Civil Investigator, from David Goldense, Esq., Counsel for Aeroplating, Inc. Dated 9/9/97. P. 001829-001830.
- 6) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Rodney K. Gilbert and Ronald King, for ARK Products, dated 5/8/98. P. 001831-001832.
- 7) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Ronald A. King, for ARK Products Co., Inc., dated 6/24/97. P. 001833-001835.
- 8) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Marietta H. Barbour, Esq, Counsel for Barry Bosies, dated 5/12/98 with attachment. P. 001836-001838.
- 9) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Marietta H. Barbour, Esq., Counsel for Barry Boises, dated 5/29/98. P. 001839-001839.
- 10) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Marietta Barbour, Esq., Previous Counsel for Auto-Pak International, dated 12/4/96 with attachment. P. 001840-001841.
- 11) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Ferdinando Saglio, for Damascus-Bishop Tube Company, Inc., dated 2/5/97. P. 001842-001842.
- 12) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Ferdinando Saglio, for Damascus-Bishop Tube Company, Inc., dated 12/5/96. P. 001843-001843.

- 13) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Brian D. Bertonneau, for Reynolds Metals Company, dated 5/11/98. P. 001844-001845.
- 14) Letter to Gary Morton, US EPA, Civil Investigator, from Ruben Tarno, for Crown Remanufacturing Inc., dated 8/8/97. P. 001846-001846.
- 15) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Stephen M. Palovitch, for Delco Wire & Cable and Delco Electronics Corporation, dated 5/19/97 with attachment. P. 001847-001848.
- 16) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Stephen M. Palovitch, for Delco Wire & Cable, dated 2/21/97. P. 001849-001849.
- 17) Letter to Gary Morton, US EPA, Civil Investigator, from James Pendleton, for Devon Apparel, dated 1/6/97 with attachments. P. 001850-001855.
- 18) Letter to US EPA, Customer Service Dept., from Ronald Alderfer, for TSG Merchandising, Inc., dated 12/18/98. P. 001856-001856.
- 19) Letter to Gary Morton, US EPA, Civil Investigator, from Gloria Ann Bean, for TSG Merchandising, Inc., dated 9/5/97. P. 001857-001857.
- 20) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Robert J. Jacobson, for Doehler-Jarvis Division of NL Industries, dated 8/7/97. P. 001858-001859.
- 21) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Paul Burkhardt, for Tate Access Floors, Inc., dated 12/9/96 with. P. 001860- 001861
- 22) Letter to Gary Morton, US EPA, Civil Investigator, from Susan P. LeGros, Esq., Counsel for Drexelbrook Engineering Company, dated 10/6/97. P. 001862-001863.
- 23) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Albert A. Z. Pappas, dated 9/18/97 with attachments. P. 001864-001868.

- 24) Letter to Linda Dietz, US EPA, Remedial Project Manager, from David M. Dumas, Esq., Counsel for The Nippert Company dated 2/20/97 with attachments. P. 001869-001872.
- 25) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Brian F. Shear, Esq., Counsel for Aerospace Display Systems, Inc., dated 11/27/96. P. 001873-001874.
- 26) Letter to Linda Dietz, US EPA, Remedial Project Manager, from William V.A. Zorn, Counsel for Allard Industries, Inc., dated 11/26/96 with attachments. P. 001875-001879.
- 27) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Robert M. Strickler, Esq., Counsel for EMECO Industries, dated 5/12/98 with attachments. P. 001880-001882.
- 28) Letter to Linda Dietz, US EPA Remedial Project Manager, from Richard W. Sherman, for Orbital Sciences Corporation dated 8/12/97. P. 001883-001884.
- 29) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Stephen B. Harris, Esq., Counsel for Fergusson-McKenna Supply Company, dated 5/18/98. P. 001885-001889.
- 30) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Dennis Courtney, President, for Andrews Glass Company, Inc. Dated 5/12/98. P. 001890-001891.
- 31) Letter to Gary Morton, US EPA, Civil Investigator, from Bill Gilfillan, President, for Giltech Inc., dated 7/21/97. P. 001892-001895.
- 32) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Alan Kratz, for Globe Solvents Co., of Maryland, dated 8/7/97. P. 001896-001896.
- 33) Letter to Linda R. Dietz, US EPA, Remedial Project Manager, Gary Morton, US EPA, Civil Investigator, and Benjamin Fields, Esq, US EPA, Assistant

- Regional Counsel, from Craig Schnee, for Hamilton Technology dated 12/20/96 with attachments. P. 001897-001938.
- 34) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Toni M Keller, Consulting Attorney, for ICI Americas Inc., dated 12/10/96. P. 001939-001941.
- 35) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Bradford C. Middlesworth, P.E., for Wyman-Gordon Company dated 8/8/97. P. 001942-001943.
- 36) Letter to Gary Morton, US EPA, Civil Investigator, from Jeanie La Torre, for Kern Foam Products Corporation, dated 7/12/97 with attachment. P. 001944-001945.
- 37) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Arthur Kern, for Kern Foam Products Corporation, dated 12/5/96. P. 001946-001947.
- 38) Letter to Gary Morton, US EPA, Civil Investigator, from Robert Fairbank, for Midwest Fastners, Inc., dated 1/27/98. P. 001948-001948.
- 39) Letter to Linda Dietz, US EPA, Remedial Project Manager, from A. Carter Fergusson, for Alex C. Fergusson Company, dated 8/8/97. P. 001949-001953.
- 40) Letter to Gary Morton, US EPA, Civil Investigator, from Doris E. Cohen for Lancaster Machinery, dated 9/3/97. P. 001954-001956.
- 41) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Doris E. Cohen, for Lancaster Machinery, received 9/11/97. P. 001957-001958.
- 42) Letter to Gary Morton, US EPA, Civil Investigator, from Albert C. Bailey, for Lavelle Company, dated 3/14/97 with attachment. P. 001959-001961.
- 43) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Philip J. Katauskas, Esq., Counsel for Lavelle Company, dated 5/7/98 with

attachments. P. 001962-002008.

- 44) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Mary Popham, for Mack Plastics Corporation dated 8/6/97. P. 002009-002009.
- 45) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Robert W. Forman, Esq., Counsel for Uni-Star Industries, Inc., dated 2/12/97 with attachments. P. 002010-002010.
- 46) Letter to Gary W. Morton, US EPA, Civil Investigator, from Robert W. Forman, Esq., Counsel for Malco c/o Microdot Connectors, Inc., dated 7/24/98 with attachments. P. 002011-002027.
- 47) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Steve Hilbert, for Narco Avionics, Inc., dated 5/6/97. P. 002028-002028.
- 48) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Edward M. Zimmer, for Narco Avionics Inc., dated 6/11/98. P. 002029-002030.
- 49) Letter to Linda Dietz, US EPA, Remedial Project Manager, from William Weidemoyer, for Ni-Chro Finishing, Inc., dated 11/26/96. P. 002031-002031.
- 50) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Terry W. Knox, Esq., Counsel for Norco Finishing, Inc., dated 8/7/97. P. 002032-002033.
- 51) Letter to Gary W. Morton, US EPA, Civil Investigator, from Scott S. Douglas, Assistant General Counsel, for Leggett & Platt Incorporated, dated 9/10/97 with attachments. P. 002034-002036.
- 52) Letter to Gary Morton, US EPA, Civil Investigator, from Scott Douglas, Assistant General Counsel, for Leggett & Platt Incorporated, dated 8/22/97 with attachments. P. 002037-002038.
- 53) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Alfred E. Enoch, Jr., for M.A.B. Paints & Coatings, dated 12/9/96. P. 002039- 002039

- 54) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Patricia A. Shaw, Counsel for Permutit/Sybron Corporation c/o U.S. Filter, dated 11/26/96. P. 002040-002041.
- 55) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Peter R. Reckmeyer, Counsel for Sybron International Corporation, dated 2/5/98. P. 002042-002042.
- 56) Letter to Gary Morton, US EPA, Civil Investigator, from Patricia A. Shaw, Counsel for U.S. Filter, dated 10/2/97. P. 002043-002044.
- 57) Letter to Gary Morton, US EPA, Civil Investigator, from Lee Diekutoski, for Philadelphia Steel Drum Company, Inc., dated 8/10/97. P. 002045-002045.
- 58) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Richard H. McNutt, for PHL Inc., dated 11/20/96. P. 002046-002046.
- 59) Letter to Gary Morton, US EPA, Civil Investigator, from Richard H. McNutt, for PHL Inc., dated 9/17/97. P. 002047-002047.
- 60) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Richard H. McNutt, for PHL Inc., dated 5/5/98. P. 002048-002048.
- 61) Letter to Linda Dietz, US EPA, Remedial Project Manager, from William J. Marano, for REPCO, dated 12/9/96 with attachments. P. 002049- 002059
- 62) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Brian D. Bertonneau, for Reynolds Metal Company, dated 5/11/98. P. 002060-002061.
- 63) Letter to Linda Dietz, US EPA, Remedial Project Manager, from David J. Selfon, for Samuel Miller & Sons, Inc., dated 11/19/96. P. 002062- 002062

- 64) Letter to Gary Morton, US EPA, Civil Investigator, from David J. Selfon, for Samuel Miller & Sons, Inc., dated 9/26/97. P. 002063-002063.
- 65) Letter to Gary Morton, US EPA, Civil Investigator, from Paul S. Lewandowski, Counsel for Stroh Brewery Company, dated 9/15/97. P. 002064-002065.
- 66) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Thomas J. Pilla, Esq., in reference to Scotco Design Group, Inc., dated 5/15/98. P. 002066-002067.
- 67) Letter to Abraham Ferdas, US EPA, Acting Director, Hazardous Waste Management Division, from Richard L. Shuman, Surgical Specialties Corporation, dated 8/12/97. P. 002068-002068.
- 68) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Friedrich W. and Rolf D. Schmidt, for Sharpoint, Inc., dated 5/8/98. P. 002069-002071.
- 69) Letter to Abraham Ferdas, US EPA, Associate Director Superfund Programs, from Janet Terenzi, for Bicoastal Corporation, dated 12/9/96 with attachments. P. 002072-002116.
- 70) Letter to Joan A. Johnson, US EPA, Assistant Regional Counsel, from Janet Terenzi, for Bicoastal Corporation, dated 5/11/98. P. 002117- 002118
- 71) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Edwin L. Meyer, Jr., Counsel for Speciality Castings, Inc., dated 11/19/96. P. 002119-002119.
- 72) Letter to Gary Morton, US EPA, Civil Investigator, from John F. Cowgill, for Speciality Castings, Inc., dated 5/20/98. P. 002120-002121.
- 73) Letter to Gary Morton, US EPA, Civil Investigator, from Matthew Podolonick, Counsel for Spencer Gifts, Inc., dated 10/24/97. P. 002122- 002122

- 74) Letter to Gary Morton, US EPA, Civil Investigator, from John P. Gruber, for American Annuity Group, Inc., dated 9/12/97. P. 002123-002123.
- 75) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Paul Burkhardt, for Tate Access Floors, Inc., dated 4/23/97 with attachments. P. 00212
4- 002130
- 76) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Thomas D. Lewis, for Total Recovery, Inc., dated 8/11/97. P. 002131-002131.
- 77) Letter to Gary Morton, US EPA, Civil Investigator, from Gary J. Johnson, For Tube Methods, Inc., dated 8/7/97. P. 002132-002132.
- 78) Letter to Gary Morton, US EPA, Civil Investigator, from L.A. Krupnick, Counsel for Inductotherm Industries, Inc., dated 7/15/97. P. 002133- 002134
- 79) Letter to Linda Dietz, US EPA, Remedial Project Manager, from Martha J. Waller, Counsel for United Chemi-Con Corporation, dated 8/12/97. P. 002135-002136.
- 80) Letter to Gary Morton, US EPA, Civil Investigator, from Thomas N. Griffin, Counsel for United Chemi-Con Corporation, dated 9/23/97. P. 00213
7- 002138
- 81) Letter to Abraham Ferdas, US EPA, from Fred G. Arkoosh, Jr., for Wilkinson Manufacturing Company, dated 12/26/96. P. 002139-002139.

- 82) Letter to Gary Morton, US EPA, Civil Investigator, from Michael A. Wittman, for Wittronics, Inc., dated 9/16/97 with attachments. P. 002140- 002147 .
- 83) Letter to Gary Morton, US EPA, Civil Investigator, from Jan Babcock, for Yuasa Exide, Inc., dated 9/30/97 with attachments. P. 002148-002209.

V) SETTLEMENT DOCUMENTS AND PUBLIC COMMENT

A) Administrative Order on Consent for *De Minimis* Settlement for the Malvern TCE Superfund Site, Docket No. CERC-III-98-074-DC. P. 002210-002240.

1) Attachment 1 - List of 168 Settling Parties

B) Federal Register Notice prepared by US EPA, Re: Proposed Administrative Settlement Under the Comprehensive Environmental Response, Compensation, and Liability Act, Request for Public Comment. P. 002241-002243.

C) Memorandum from Carlyn Winter Prisk, US EPA, Civil Investigator, to the file Re: Malvern Proposed *De Minimis* Settlement, Public Comment. P. 002244- 002244